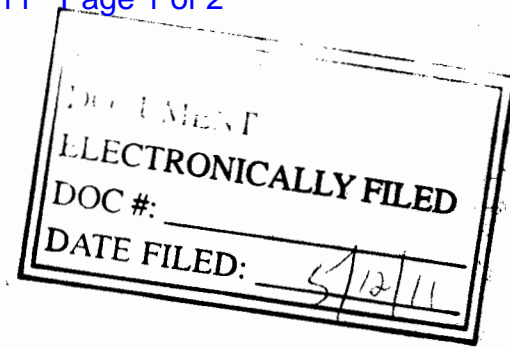


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MUNICIPAL DERIVATIVES
ANTITRUST LITIGATION

MDL No. 1950



THIS DOCUMENT RELATES TO:

*State of West Virginia v. Bank of America,
N.A.*, No. 10-cv-769

Master Docket No. 08-cv-2516 (VM) (GWG)

**STIPULATION AND [PROPOSED]
ORDER CONCERNING TIME TO
ANSWER FIRST AMENDED
COMPLAINT**

WHEREAS, Plaintiff State of West Virginia ("Plaintiff") filed its First Amended Complaint on June 21, 2010 (the "Complaint");

WHEREAS, Defendant Royal Bank of Canada ("RBC") moved to dismiss the Complaint on August 23, 2010;

WHEREAS, the Court denied RBC's motion to dismiss by Decision and Order dated April 28, 2011;

WHEREAS, under Rule 12(a)(4)(A) of the Federal Rules of Civil Procedure, RBC's Answer to the Complaint is now due on May 13, 2011;

WHEREAS, the parties have conferred and agreed that, due to the length and complexity of the Complaint, a two-week extension of time until May 27, 2011 for RBC to file its Answer to the Complaint is appropriate;

WHEREAS, no previous request for an extension of time for RBC to answer the Complaint has been made;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and RBC that RBC will file its answer to the Complaint on or before May 27, 2011.

Dated: May 12, 2011

By: Colleen J. O'Loughlin

Kenneth I. Schacter
Colleen J. O'Loughlin
BINGHAM MCCUTCHEN LLP
399 Park Avenue
New York, NY 10022
Tel: (212) 705-7000
Fax: (212) 702-3622

Counsel for Royal Bank of Canada

By: Joshua I. Barrett

Joshua I. Barrett
DITRAPANO BARRETT & DIPIERO, PLLC
604 Virginia Street East
Charleston, WV 25301
Tel: (304) 342-0133
Fax: (304) 342-4605

Counsel for State of West Virginia

So Ordered:

Gabriel W. Gorenstein
Honorable Gabriel W. Gorenstein
United States Magistrate Judge

Dated: